

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ETHEREUM VENTURES, LLC,

Plaintiff,

v.

CHET MINING CO LLC and CHET  
STOJANOVICH,

Defendant.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 2/7/20

No. 1:19-cv-7949 (LLS)

**VENABLE LLP'S MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR  
DEFENDANTS CHET MINING CO LLC AND CHET STOJANOVICH**

Pursuant to Rule 1.4 of the Local Civil Rules of the United States District Court for the Southern District of New York, the undersigned, on behalf of himself and the firm Venable LLP, hereby moves to withdraw as counsel of record for Defendants Chet Mining Co LLC and Chet Stojanovich (collectively, "Defendants").

In support of this motion, the undersigned states and affirms that:

- This case was initially filed in the Southern District of New York. *See* S.D.N.Y. No. 1:19-cv-7949 (LLS). Attorneys from Venable LLP appeared on behalf of Defendants.
- Defendants have failed to provide any payment to retain Venable LLP's counsel.
- This matter is in its earliest stages. Subsequent to the filing of the Complaint, Plaintiff and Defendants filed a joint stipulation proposing an order to extend Defendants' time to respond and/or answer Plaintiff's Complaint. *See* S.D.N.Y. No. 1:19-cv-7949 (LLS), Dkt. No. 10. On December 5, 2019, the Court entered a stipulation and order extending Defendants' time to respond and/or answer Plaintiff's Complaint from December 16, 2019 to December 23, 2019. *See* S.D.N.Y. No. 1:19-cv-7949 (LLS), Dkt. No. 11. On

December 23, 2019, Plaintiff and Defendants filed another joint stipulation proposing an order to extend Defendants' time to respond and/or answer Plaintiff's Complaint from December 23, 2019 to January 6, 2019. See S.D.N.Y. No. 1:19-cv-7949 (LLS), Dkt. No. 12.

- The Court did not take any action with respect to the pending stipulation and order to extend time.
- Venable LLP is not asserting a retainer or charging lien in this matter.

For these reasons, the parties and the Court will not be prejudiced by the withdrawal of the attorneys of Venable LLP as counsel for Defendants. Therefore, the undersigned respectfully requests that the Court to grant the motion for Venable LLP to withdraw as counsel of record for Defendants.

Dated: New York, New York  
January 6, 2020

VENABLE LLP

By: /s/ Edmund M. O'Toole  
Edmund M. O'Toole

VENABLE LLP  
1270 Avenue of the Americas, 24th Floor  
New York, New York 10020  
Tel.: (212) 307-5500

SO ORDERED this 7<sup>th</sup> day of Feb, 2020:

Louis L. Stanton  
United States District Judge

**CERTIFICATE OF SERVICE**

I, Edmund M. O'Toole, hereby certify that on January 6, 2020, I caused the foregoing Motion to Withdraw as Counsel of Record to be filed electronically and served on counsel of record via the Court's ECF system.

By: /s/ Edmund M. O'Toole  
Edmund M. O'Toole



Laya Varanasi  
VENABLE LLP  
1270 Avenue of the Americas, 24th Floor  
New York, New York 10020

## Varanasi, Laya

---

**From:** Chet Stojanovich <chet@chetminingco.com>  
**Sent:** Thursday, January 9, 2020 1:51 AM  
**To:** Wilson, D. Edward Jr.  
**Cc:** O'Toole, Edmund M.; Varanasi, Laya  
**Subject:** Re: Court documents: Withdrawal of Representation, Answer, and Corporate Disclosure Statement

Received, thank you. I got my deposit ready fyi. I heard from their lawyer that we had an issue,

Best Regards,

**Chet Stojanovich**  
President & CEO

---

**Chet Mining, LLC**  
26 Ottawa Avenue, Happy Valley-Goosebay  
Newfoundland and Labrador A0P 1C0 Canada  
**t:** 833.544.4826  
**m:** 310.824.3903  
**e:** [chet@chetminingco.com](mailto:chet@chetminingco.com)  
**Skype:** Chet.Stojanovich  
**Telegram:** Chet11  
To schedule a meeting: <https://calendly.com/chet-7>  
[www.chetminingco.com](http://www.chetminingco.com)



The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

On Tue, Jan 7, 2020 at 2:02 PM Wilson, D. Edward Jr. <[dewilsonjr@venable.com](mailto:dewilsonjr@venable.com)> wrote:

Chet,

I am really sorry to have had to do this, but we have now filed to withdraw from our representation of you and Chet Mining.

This document and others filed yesterday are attached below for your records.

You will need to find other counsel.

We wish you well.

Ed

**Ed Wilson, Esq. | Venable LLP**

t 202.344.4819 | f 202.344.8300 | m 703.395.8807

600 Massachusetts Avenue, NW, Washington, DC 20001

[dewilsonjr@venable.com](mailto:dewilsonjr@venable.com) | [www.Venable.com](http://www.Venable.com)

**From:** [NYSD ECF Pool@nysd.uscourts.gov](mailto:NYSD_ECF_Pool@nysd.uscourts.gov) <[NYSD ECF Pool@nysd.uscourts.gov](mailto:NYSD_ECF_Pool@nysd.uscourts.gov)>

**Date:** Monday, Jan 06, 2020, 7:11 PM

**To:** [CourtMail@nysd.uscourts.gov](mailto:CourtMail@nysd.uscourts.gov) <[CourtMail@nysd.uscourts.gov](mailto:CourtMail@nysd.uscourts.gov)>

**Subject:** Activity in Case 1:19-cv-07949-LLS Ethereum Ventures, LLC v. Chet Mining Co, LLC et al Motion to Withdraw as Attorney

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Southern District of New York

### Notice of Electronic Filing

The following transaction was entered by O'Toole, Edmund on 1/6/2020 at 7:10 PM EST and filed on 1/6/2020

**Case Name:** Ethereum Ventures, LLC v. Chet Mining Co, LLC et al

**Case Number:** 1:19-cv-07949-LLS

**Filer:** Chet Mining Co, LLC  
Chet Stojanovich

**Document Number:** 16

**Docket Text:**

**MOTION for Edmund M. O'Toole to Withdraw as Attorney . Document filed by Chet Mining Co, LLC, Chet Stojanovich.(O'Toole, Edmund)**

**1:19-cv-07949-LLS Notice has been electronically mailed to:**

Edmund M. O'Toole [emotoole@venable.com](mailto:emotoole@venable.com), [nylitigationdocketing@venable.com](mailto:nylitigationdocketing@venable.com)

John Frederick Harwick [jharwick@joneshacker.com](mailto:jharwick@joneshacker.com), [ddudley@joneshacker.com](mailto:ddudley@joneshacker.com), [diversen@joneshacker.com](mailto:diversen@joneshacker.com),  
[djohnson@joneshacker.com](mailto:djohnson@joneshacker.com), [sfebus@joneshacker.com](mailto:sfebus@joneshacker.com)

**1:19-cv-07949-LLS Notice has been delivered by other means to:**

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1008691343 [Date=1/6/2020] [FileNumber=23355217-0  
] [435de8cab1f91062cfea2c6b08b949ecb29c3836b3bfb0d50fa0785dd4b5c2a3422  
9e72796bbf803225f9161deaa16b8fd2866959b36f4e19b000555db15ab36]]

**From:** [NYSD ECF Pool@nysd.uscourts.gov](mailto:NYSD_ECF_Pool@nysd.uscourts.gov) <[NYSD ECF Pool@nysd.uscourts.gov](mailto:NYSD_ECF_Pool@nysd.uscourts.gov)>

**Date:** Monday, Jan 06, 2020, 7:08 PM

**To:** [CourtMail@nysd.uscourts.gov](mailto:CourtMail@nysd.uscourts.gov) <[CourtMail@nysd.uscourts.gov](mailto:CourtMail@nysd.uscourts.gov)>

**Subject:** Activity in Case 1:19-cv-07949-LLS Ethereum Ventures, LLC v. Chet Mining Co, LLC et al Answer to Complaint

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Southern District of New York

**Notice of Electronic Filing**



The following transaction was entered by O'Toole, Edmund on 1/6/2020 at 7:07 PM EST and filed on 1/6/2020

**Case Name:** Ethereum Ventures, LLC v. Chet Mining Co, LLC et al

**Case Number:** 1:19-cv-07949-LLS

**Filer:** Chet Mining Co, LLC  
Chet Stojanovich

**Document Number:** 15

**Docket Text:**

**ANSWER to [1] Complaint,. Document filed by Chet Mining Co, LLC, Chet Stojanovich.(O'Toole, Edmund)**

**1:19-cv-07949-LLS Notice has been electronically mailed to:**

Edmund M. O'Toole [emotoole@venable.com](mailto:emotoole@venable.com), [nylitigationdocketing@venable.com](mailto:nylitigationdocketing@venable.com)

John Frederick Harwick [jharwick@joneshacker.com](mailto:jharwick@joneshacker.com), [ddudley@joneshacker.com](mailto:ddudley@joneshacker.com), [diversen@joneshacker.com](mailto:diversen@joneshacker.com),  
[djohnson@joneshacker.com](mailto:djohnson@joneshacker.com), [sfebus@joneshacker.com](mailto:sfebus@joneshacker.com)

**1:19-cv-07949-LLS Notice has been delivered by other means to:**

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1008691343 [Date=1/6/2020] [FileNumber=23355193-0  
] [743b0f12e9aaae688dc14b1c7654859ca25d3f9a1a475b5305617835ea106e7c795  
0a00e4c5bb58ed9dc51c32395f26307370edb32632cdc0a824c04f274eca6]]

**From:** [NYSD ECF Pool@nysd.uscourts.gov](mailto:NYSD_ECF_Pool@nysd.uscourts.gov) <[NYSD ECF Pool@nysd.uscourts.gov](mailto:NYSD_ECF_Pool@nysd.uscourts.gov)>

**Date:** Monday, Jan 06, 2020, 7:05 PM

**To:** [CourtMail@nysd.uscourts.gov](mailto:CourtMail@nysd.uscourts.gov) <[CourtMail@nysd.uscourts.gov](mailto:CourtMail@nysd.uscourts.gov)>

**Subject:** Activity in Case 1:19-cv-07949-LLS Ethereum Ventures, LLC v. Chet Mining Co, LLC et al Rule 7.1 Corporate Disclosure Statement

This is an automatic e-mail message generated by the CM/ECF system. Please **DO NOT RESPOND** to this e-mail because the mail box is unattended.

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To

avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court

Southern District of New York

## Notice of Electronic Filing

The following transaction was entered by O'Toole, Edmund on 1/6/2020 at 7:05 PM EST and filed on 1/6/2020

**Case Name:** Ethereum Ventures, LLC v. Chet Mining Co, LLC et al  
**Case Number:** 1:19-cv-07949-LLS  
**Filer:** Chet Mining Co, LLC  
**Document Number:** 14

### Docket Text:

**RULE 7.1 CORPORATE DISCLOSURE STATEMENT. No Corporate Parent. Document filed by Chet Mining Co, LLC.(O'Toole, Edmund)**

**1:19-cv-07949-LLS Notice has been electronically mailed to:**

Edmund M. O'Toole [emotoole@venable.com](mailto:emotoole@venable.com), [nylitigationdocketing@venable.com](mailto:nylitigationdocketing@venable.com)

John Frederick Harwick [jharwick@joneshacker.com](mailto:jharwick@joneshacker.com), [ddudley@joneshacker.com](mailto:ddudley@joneshacker.com), [diversen@joneshacker.com](mailto:diversen@joneshacker.com),  
[djohnson@joneshacker.com](mailto:djohnson@joneshacker.com), [sfebus@joneshacker.com](mailto:sfebus@joneshacker.com)

**1:19-cv-07949-LLS Notice has been delivered by other means to:**

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1008691343 [Date=1/6/2020] [FileNumber=23355181-0  
] [b48335ffab4297fb5903c4d4d4dff0bbdb556006b2b30cfb4d10f6cedc5cc867edc  
d6f5cc940438636716e9e004301a69d56a93e21ffc7643522eb57da1fc3b5]]

\*\*\*\*\*  
This electronic mail transmission may contain confidential or privileged information. If  
you believe you have received this message in error, please notify the sender by reply  
transmission and delete the message without copying or disclosing it.  
\*\*\*\*\*